

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAUREN DELASHMENT,

Plaintiff,

V.

FORD MOTOR COMPANY,

Defendant.

Case No. 1:22-cv-06583

Hon. Manish S. Shah

PLAINTIFF'S MOTION TO EXTEND DEADLINE TO REINSTATE CASE

NOW COMES the Plaintiff, Lauren Delashment (“Plaintiff”), by and through her attorneys, Sulaiman Law Group, LTD., moving this Honorable Court to extend the deadline to reinstate this case, and in support thereof, stating as follows:

1. Plaintiff filed a Notice to Voluntary Dismissal, hereby voluntarily dismissing her claims against the Defendant, Ford Motor Company, without prejudice with leave to reinstate through March 1, 2023.

2. Plaintiff requests that their leave to reinstate be extended to March 30, 2023 and upon such date, the dismissal shall become with prejudice, with each party to bear its own costs and attorney fees.

4. The relief sought herein will not prejudice any of the Parties and is sought in good faith.

WHEREFORE, Plaintiff respectfully requests the Court to enter an order extending the reinstatement date to March 30, 2023, and grant such other relief as the Court deems appropriate.

Dated this 1st day of March, 2023.

/s/ Chad W. Eisenback, Esq.
Chad W. Eisenback, Esq.
Nathan C. Eisenback, Esq.
SULAIMAN LAW GROUP LTD.

2500 S. Highland Avenue, Suite 200
Lombard, Illinois 60148
Phone (630) 575-8181
Fax (630) 575 – 8188
ceisenback@sulaimanlaw.com
nvolheim@sulaimanlaw.com
Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 1st day of March, 2023, a true and correct copy of the foregoing has been provided electronically via electronic mail and/or via U.S. mail to following:

Kathleen M. Nemechek
Megan D. Costello
Berkowitz Oliver LLP
2600 Grand Boulevard, Suite 1200
Kansas City, Missouri 64108
(816) 561-7007
knemechek@berkowitzoliver.com
mcostello@berkowitzoliver.com

Mark H. Boyle
Emily E. Dory
Karen Kies DeGrand
Donohue Brown Mathewson & Smyth LLC
131 South Dearborn Street, Suite 1600
Chicago, Illinois 60603
(312) 422-0973
boyle@dbmslaw.com
dory@dbmslaw.com
degrand@dbmslaw.com

Attorneys for Defendant

/s/ Chad W. Eisenback, Esq.
Chad W. Eisenback, Esq.